

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

CWI, INC.,)	
)	
Petitioner,)	
)	Case No.
v.)	
)	
DOGWOOD SHOOTING SUPPLY, LLC,)	
)	
Respondent.)	

NOTICE OF REMOVAL

Respondent Dogwood Shooting Supply, LLC (“Respondent”), gives notice that this action is removed from the Circuit Court of Lafayette County, Missouri, Case No. 22JO-CC00124, to the United States District Court for the Western District of Missouri pursuant to 28 U.S.C. §1332(a)(1), §1441(a) and (b), and §1446(a), (b), (c), and (d). In support of this Notice of Removal, Response states as follows:

1. On May 13, 2022, Petitioner CWI, Inc. (“Petitioner”) filed this action in the Circuit Court of Johnson County, Missouri against Respondent, Case No. 22JO-CC00124. Pursuant to §1446(a), a copy of the state court docket sheet, along with copies of all documents and pleadings filed and served in this case and of record in the Circuit Court of Johnson County are attached to this Notice as Exhibits 1 through 4.
2. Service of Process was accomplished on Respondent on June 11, 2022. As such, this Notice of Removal is filed within 30 days of service of a pleading containing grounds for removal and thus removal is timely pursuant to 28 U.S.C. §1446.
3. Pursuant to 28 U.S.C. §1332(a), jurisdiction and venue are proper in this Court, as Petitioner and Respondent are citizens of different states; all of their members of Dogwood are

Missouri citizens; none of the members, officers, principals, or shareholders of Petitioner are citizens of the state of Missouri; and the amount in controversy is in excess of \$75,000.00.

4. This Notice of Removal will be timely filed with the Clerk of the Court for the Circuit Court of Johnson County, pursuant to 28 U.S.C. §1446(d).

5. This Notice of Removal is filed by Respondent.

6. Respondent denies the allegations contained in Petitioner's Petition for Damages ("Petition") and files this Notice of Removal without waiving any defenses, objections, exceptions, or obligations that may exist in its favor in either state or federal court.

7. Further, in making the allegations in this Notice of Removal, Respondent does not concede in any way that the allegations in the Petition are accurate, that Petitioner has asserted claims upon which relief can be granted, or that recovery of any of the amounts sought is authorized or appropriate.

8. Respondent also reserves the right to amend or supplement this Notice of Removal. If any questions arise as to the propriety of the removal of this action, Respondent expressly requests the opportunity to present such further evidence necessary to support its position that this action is removable.

9. For the reasons set for above, Respondent removed this action, Civil Case No. 22JO-CC00124, currently pending in the Circuit Court of Johnson County, Missouri, to this Court. Respondent respectfully requests this Court assume jurisdiction over this matter and grant Respondent such other and further relief as this Court deems just and proper.

Respectfully submitted,

/s/ Jason L. Moehlman
JASON L. MOEHLMAN #53743
2641 NE McBaine Drive
Lee's Summit, Missouri 64064
(816) 272-5301 - Telephone
(816) 222-0686 - Fax
jason@moehlmanlaw.com

**MOEHLMAN LAW FIRM, LLC
ATTORNEY FOR PETITIONER**

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of July 2022, I electronically filed the above and foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of the electronic filing to all counsel of record.

/s/ Jason L. Moehlman
Jason L. Moehlman,
Attorney for Defendant